



CALAVERAS
COUNCIL of
GOVERNMENTS

November 21, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

RE: Preliminary Discussion Draft of Updates to the CEQA Guidelines
Implementing Senate Bill 743 (Steinberg, 2013)

Dear Mr. Calfee:

The Calaveras Council of Governments (CCOG) appreciates the opportunity to review the *Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743* prepared by the Governor's Office of Planning and Research (OPR). The CCOG is the Regional Transportation Planning Agency for Calaveras County which coordinates with our partners and communities to optimize the existing and future transportation systems.

The CCOG recognizes the need to establish an alternative to Level of Service (LOS) as a criterion for determining the significance of transportation impacts of projects. We also recognize the need to assist in the reduction of greenhouse gas (GHG) emissions and agree with OPR's findings that Vehicle Miles Traveled (VMT) is the best metric to promote infill, transit oriented development, and diversity of land uses.

While we don't disagree with OPR's proposed changes, we are asking OPR to provide additional guidance and advisory on its application specific to rural regions and model approaches, as well as additional time for development of local tools and procedures. The following are our concerns regarding implementation of the proposed changes to the CEQA guidelines.

1. Thresholds/Regional Averages – The CCOG maintains a trip based travel demand model, however, differentiating the project level VMT by land use on the model network would be difficult. This would require upgrades to the existing model and development of a regional average and efficiency metrics by which to evaluate individual development proposals.

In addition, we have concerns regarding the ability to capture VMT reductions based on a regional average. Many residents travel out-of-county for employment, higher education, medical, shopping, and other services that are not available in Calaveras County. Page 9 of the Discussion Draft uses an example of how "the addition of regional serving retail to a neighborhood" might "draw customers from far beyond the single neighborhood, and therefore might actually increase vehicle miles traveled overall." In contrast, adding a regional serving

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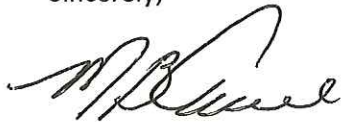
retail to an existing community in our region would most likely decrease overall VMT, enabling residents to drive shorter distances to a location in-county versus out-of-county. We are asking OPR to consider extending time for application in rural areas as well as additional guidance to address these issues.

2. Mitigation Measures and VMT Reduction – Our second concern is regarding the mitigation suggestions recommended for inclusion in the CEQA Guidelines for a project that reaches the level of a significant impact under the proposed VMT metric, and their effectiveness to reducing VMT in a rural region such as Calaveras. Calaveras County has a land area of 1,020 square miles, with a population density of approximately 44 persons per square mile (0.7 persons per acre). Given the terrain and distances between communities and destinations, bicycling and walking as viable alternatives to the automobile is limited.

In addition, our travel demand model does not take into account mode split, as nearly 90 percent of residents in Calaveras commute to work by automobile. Evaluating VMT reductions by a mode shift is currently beyond the capacity of our modeling capabilities. It would be helpful if there was additional guidance on different levels of VMT reduction based on different areas or neighborhood types.

The CCOG appreciates the opportunity to comment on the Preliminary Discussion Draft and look forward to additional guidance on appropriate methodologies and applicability specific to rural areas.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Eads', with a stylized, flowing script.

Melissa Eads
Executive Director